

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE WESTERN DISTRICT OF OKLAHOMA**

3 ISABELA SNEED,)
4 Plaintiff,)
5)
6 vs.) Case No. 22-cv-00031-R
7)
8 INDEPENDENT SCHOOL)
9 DISTRICT NO. 16 OF)
10 PAYNE COUNTY,)
11 Defendant.)

12 **DEPOSITION OF**
13 **TREVOR FIELDSEND**

14
15
16
17
18
19 DATE: MARCH 1, 2023

20 REPORTER: MARISA SPALDING, CSR, RPR

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22
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EXHIBIT

2

A P P E A R A N C E S:

FOR THE PLAINTIFF:

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BY: MR. DANIEL E. SMOLEN

FOR THE DEFENDANT:

ROSENSTEIN, FIST & RINGOLD
525 South Main Street, Suite 700
Tulsa, Oklahoma 74103

BY: MR. JOHN E. PRIDDY

DEPOSITION OF **TREVOR FIELDSEND**, produced
as a witness duly sworn by me, taken in the
above-styled and numbered cause on the 1st
day of March, 2023, at 3:01 p.m., before
MARISA SPALDING, Certified Shorthand
Reporter No. 01750 in and for the State of
Oklahoma, at the offices of Smolen &
Roytman, 701 South Cincinnati Avenue,
Tulsa, Oklahoma, in accordance with the
agreement hereinafter set forth.

A G R E E M E N T S

It is hereby agreed by and between the parties hereto, through their respective attorneys appearing herein, that the Plaintiff may take the deposition of **TREVOR FIELDSEND** at this time, that said deposition is being taken by Subpoena and said deposition is being taken with the same force and effect as though all the requirements of the Rules and Statutes had been fully complied with.

It is further agreed by and between the parties hereto, through their attorneys appearing herein, that any and all objections to any question, except as to form contained herein, may be made upon the offering of this deposition in evidence upon the trial of this cause with the same force and effect as though the witness were present in person and testifying from the witness stand.

It is further agreed by and between the parties hereto, through their attorneys appearing herein, that this deposition may be signed before any Notary Public and

1 thereafter returned into Court and used
2 upon the trial of this cause with the same
3 force and effect as though all requirements
4 of the Rules and Statutes with reference to
5 signature and return had been fully
6 complied with.

7 It is further agreed by and between the
8 parties hereto, through their attorneys
9 appearing herein, that if the original of
10 this deposition has not been properly
11 signed before any officer authorized to
12 administer oaths within (30) days after its
13 submission to said witness and thereafter
14 returned to the attorney who asked the
15 first question appearing in the transcript
16 prior to any contested hearing in this
17 cause, that an unsigned, certified copy may
18 be substituted and used for all purposes,
19 the same as though the original had been
20 signed by said witness and properly
21 returned.

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1 was after being out for three years.

2 Q Okay. And I know it's a big school.
3 I just didn't know if for any reason like
4 if they were in cross country or anything
5 like that, that you recall, either of them?

6 A No.

7 Q Okay.

8 A Neither one of those.

9 Q I also wanted you to look at -- and
10 this will explain why you got a subpoena.

11 A Yeah.

12 Q I want you to look at Plaintiff's
13 Exhibit 15, and it's an email string and it
14 kind of starts at the back.

15 A Okay.

16 Q And then there's a separate middle
17 page. And maybe you would be able to
18 explain the middle page to me more than I
19 understand it. It looks like some kind of
20 encrypted receipt but...

21 A Yeah.

22 Q I'll walk you through it, at least
23 what I know. So I have -- this was
24 produced in discovery in this case by
25 Stillwater Public Schools.

1 A Hum.

2 Q And it -- so it starts down at the
3 bottom.

4 A The back page?

5 Q On -- I'll refer to SPS 610 at the
6 bottom right.

7 A Yeah.

8 Q And so it looks as though -- and I'm
9 at the bottom here. It says, during PTC,
10 whenever I was being a dedicated baseball
11 coach and working for \$2 an hour, someone
12 came into my room and took/stole my
13 Hawaiian license plate?

14 A Yeah.

15 Q I honestly forget about this, but
16 the kids put me into depression today, and
17 I randomly remember the one thing that
18 makes me smile during the day, the rainbow
19 on the license plate. If anyone has seen
20 this license plate, please return. I'm
21 really missing it. And then on the next --
22 on the -- on the very first page -- and I'm
23 at Page 1 of it -- it looks as though you
24 responded to that post?

25 A Right.

1 Q And you said, maybe one of your 9th
2 grade female entourage took it for a
3 souvenir?

4 A Yeah.

5 Q For the very first time I caught it,
6 there was a picture of the Queen on the
7 third page of that. I never put it
8 together that maybe you had also put the
9 Queen picture on there, but I didn't know?

10 A Probably. I could have done it.

11 Q Okay.

12 A I get crap all the time about stuff
13 like that so I --

14 Q It makes more sense now with the
15 Queen --

16 A Yeah, yeah.

17 Q -- after I meet you?

18 A Yeah.

19 Q So I've -- I've asked about this
20 email with other people, but I want to just
21 make sure I understand initially when we
22 see that it goes to JH Staff on the email
23 --

24 A Yeah.

25 Q -- what was your understanding of

1 who were the recipients or who would be the
2 recipients of that?

3 A Of that email?

4 Q Of the JH Staff, yeah?

5 A I guess anybody that was in the
6 building, I guess.

7 Q Okay. I didn't know if you had an
8 appreciation for whether or not that that
9 was just faculty or if it also included
10 administrators?

11 A I thought it was just faculty.

12 Q Okay.

13 A Yeah.

14 Q There's been inconsistent testimony.
15 Someone said that they think that maybe
16 there's one that includes faculty and
17 administration, and then there's a
18 different list that just includes faculty.
19 And they didn't know either way which it
20 was labeled, so I was just curious?

21 A Well, just faculty and staff. I
22 thought it was just faculty and then
23 kitchen workers, you know, and janitors and
24 that kind of thing so...

25 Q Okay. Mr. Gonzalez testified today

1 before you came in --

2 A Uh-huh.

3 Q -- that you also taught across the
4 hall from Morejon?

5 A Yeah.

6 Q Is that right?

7 A Yeah.

8 Q Okay. And he had also said that
9 there was a female computer teacher and
10 yearbook -- she ran the yearbook for the
11 school --

12 A Right, yeah.

13 Q -- that was also next to you?

14 A Yeah, yeah.

15 Q Do you recall who -- who that was?

16 A Yeah, that was Janloo.

17 Q Okay. How do you spell her name?

18 A J-a-n-l-o-o.

19 Q Okay.

20 A Kristin Janloo.

21 Q Janloo?

22 A Yeah.

23 Q And was that -- is that her full
24 name or is it the last name?

25 A Janloo is the last name. Kristin is

1 the first name.

2 Q Kristin is the first name?

3 A Uh-huh.

4 Q Okay, thank you.

5 A Uh-huh.

6 Q Mr. Gonzalez testified before your
7 deposition today that the amount of young
8 girls in Mr. Morejon's classroom during
9 breaks and during the lunch hour were
10 objectively strange?

11 A Yeah.

12 Q It was out of the ordinary?

13 A Uh-huh.

14 Q He said it was obvious. It should
15 have been obvious to the school
16 administration that there was something not
17 right with the situation?

18 A Right.

19 Q Is that consistent with your memory?

20 A He was a really popular guy. He was
21 popular with the guys with the baseball
22 team he coached, and he was popular with
23 female students, too. And in a different
24 way -- I mean, I have two daughters that
25 has gone through the junior high and so,

1 you know, I'm protective of them.

2 But I didn't ever see anything that
3 would -- that made me think that he was
4 doing anything inappropriate. I mean, like
5 I said, he was popular and there was -- and
6 there was girls over there and boys over
7 there -- girls at lunchtime.

8 And, you know, sometimes some goofy
9 stuff like stealing his desk chair and
10 stuff like that and rolling it down the
11 hall. And I try to work at lunchtime, and
12 I'd go out and say, hey, you know, what's
13 going on here, you know? And then to be
14 honest, I didn't think he was in there half
15 the time, you know.

16 And then actually -- I actually reported
17 this to the office one time saying, hey,
18 you know, I couldn't get any work done
19 because it's so loud down there. And I
20 don't know if anybody spoke to him or
21 anything or what. But, you know, I -- I
22 didn't see -- just horsing around kind of
23 thing, you know.

24 Q I understand that you didn't see him
25 raping young girls in his classroom, okay?

1 A Oh, yeah, yeah, yeah.

2 Q I understand that.

3 A Yeah, yeah.

4 Q I understand that you didn't see him

5 --

6 A Right.

7 Q -- molesting young girls in his

8 classroom?

9 A Right.

10 Q That's not why I'm here to talk to
11 you?

12 A Yeah.

13 Q But what's important to me is that
14 in your email, okay --

15 A Uh-huh.

16 Q -- and going back to -- this is,
17 again, 2019, okay?

18 A Yeah, yeah.

19 Q You didn't say, maybe it's one of
20 your student entourages, maybe it's one of
21 your baseball players, right?

22 A Yeah.

23 Q It was very clear --

24 A Right.

25 Q -- that maybe it's one of your 9th

1 grade female entourage?

2 A I mean, yeah, I mean, it may not
3 have been 9th grade either. It may have
4 been 8th grade. You know, they just...

5 Q There was testimony from Mr.
6 Gonzalez that he recalls even 9th grade
7 girls going to Morejon's room during the
8 lunch hour --

9 A Yes.

10 Q -- even though he wasn't their
11 teacher anymore?

12 A Right.

13 Q But they would still come and sit in
14 his room during lunch hour?

15 A I think the reason I assumed they
16 were 9th grade girls, because I think there
17 was a couple of girls that ran cross
18 country for me. I only coach 7th and 8th
19 grade. And I kind of said to them one
20 time, what are you guys doing there? So I
21 kind of concluded they were 9th grade
22 girls. But, you know, I...

23 Q In the police report -- you know, I
24 think that it's very courageous for a girl
25 of any age to report it?